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8 **BEFORE THE**
BOARD OF REGISTERED NURSING
9 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

10 In the Matter of the Accusation Against:
11

Case No. **2012- 38**

12 **REMEDIOS NEBRES PRADO, a.k.a.**
REMEDIOS L. NEBRES
13 16144 Talbot Court
Chino Hills, CA 91709

A C C U S A T I O N

14 Registered Nurse License No. 196914
15

16 Respondent.

17 Complainant alleges:

18 **PARTIES**

19 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her
20 official capacity as the Executive Officer of the Board of Registered Nursing (Board),
21 Department of Consumer Affairs.

22 2. On or about March 31, 1969, the Board issued Registered Nurse License Number
23 196914 to Remedios Nebres Prado, a.k.a. Remedios L. Nebres (Respondent). The Registered
24 Nurse License was in full force and effect at all times relevant to the charges brought herein and
25 will expire on October 31, 2012, unless renewed.

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FIRST CAUSE FOR DISCIPLINE

(Falsification of Medical Records)

9. Respondent is subject to disciplinary action under Code section 2761, subdivisions (a) and (d), for unprofessional conduct in that Respondent falsified patient medical records. On or about December 17, 2008, the California Department of Health Care Services (DHCS) conducted a three-day audit of Delta Hospice (Delta) of Chino, California, where Respondent occupied the position of Director of Nursing until Delta terminated her on December 23, 2008. Delta Hospice could not produce patient L.M.'s first admission records for the treatment period covering May 22, 2007 to June 8, 2007. Instead of informing DHCS of the loss, Respondent pulled L.M.'s second admission records and generated a new set of patient records. Respondent was able to do this by copying the consent form from the second admission chart and backdating the record to reflect when Delta first admitted L.M. For records that contained signatures of physicians or other medical providers, Respondent made a photocopy of the records and used corrective fluid to alter dates. For records requiring only Respondent's signature, Respondent originated new records and signed and dated them. She copied social worker notes from the second admission chart onto the first admission record. Then she turned over the records to DHCS, whose auditors subsequently questioned Delta and Respondent about the source of the records. Respondent confessed to DHCS auditors that she fabricated the records.

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1 PRAYER

2 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
3 and that following the hearing, the Board issue a decision:

4 1.1. Revoking or suspending Registered Nurse License Number 196914, issued to
5 Remedios Nebres Prado, a.k.a. Remedios L. Nebres;

6 1.2. Ordering Remedios Nebres Prado to pay the Board the reasonable costs of the
7 investigation and enforcement of this case, pursuant to Business and Professions Code section
8 125.3;

9 1.3. Taking such other and further action as is deemed necessary and proper.

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11 DATED: July 19, 2011

Louise R. Bailey
LOUISE R. BAILEY, M.ED., RN
Executive Officer
Board of Registered Nursing
State of California
Complainant

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